

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; STATE OF NEW YORK; STATE OF HAWAI'I; STATE OF ARIZONA; STATE OF CALIFORNIA; STATE OF COLORADO; STATE OF CONNECTICUT; STATE OF DELAWARE; STATE OF ILLINOIS; STATE OF MAINE; STATE OF MARYLAND; COMMONWEALTH OF MASSACHUSETTS; PEOPLE OF THE STATE OF MICHIGAN; STATE OF MINNESOTA; STATE OF NEVADA; STATE OF NEW JERSEY; STATE OF NEW MEXICO; STATE OF OREGON; STATE OF VERMONT; STATE OF WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; INSTITUTE OF MUSEUM AND LIBRARY SERVICES; KEITH E. SONDERLING, in his official capacity as Acting Director of the Institute of Museum and Library Services; MINORITY BUSINESS AND DEVELOPMENT AGENCY; MADIHA D. LATIF, in her official capacity as Deputy Under Secretary of Commerce for Minority Business Development; HOWARD LUTNICK, in his official capacity as Secretary of Commerce; FEDERAL MEDIATION AND CONCILIATION SERVICE; GREGORY GOLDSTEIN, in his official capacity as Acting Director of the Federal Mediation and Conciliation Service; OFFICE OF MANAGEMENT AND BUDGET; RUSSELL T. VOUGHT, in his official capacity as Director of the Office of Management and Budget;

Defendants.

Case No.: 1:25-cv-128

**PLAINTIFF STATES' NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF THEIR MOTION FOR PRELIMINARY INJUNCTION**

**PLAINTIFF STATES' NOTICE OF SUPPLEMENTAL AUTHORITY  
IN SUPPORT OF THEIR MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff States submit the following supplemental authority in support of their Motion for Preliminary Injunction (ECF No. 3).

On May 1, 2025, the District Court for the District of Columbia granted in part plaintiffs' motion for a temporary restraining order (TRO) preventing the defendants from taking additional steps to close the Institute of Museum and Library Sciences (IMLS) pursuant to Executive Order 14238, "Continuing the Reduction of the Federal Bureaucracy"—the executive order at issue in this case. *Am. Library Ass'n, v. Sonderling*, No. CV 25-1050 (RJL), 2025 WL 1262054, --- F. Supp. 3d --- at \*2 (D.D.C. May 1, 2025) (a copy of the opinion is attached as Exhibit 1). The court concluded that the termination of the agency "appeare[d] to violate . . . clear statutory mandates" and "contravene[d] Congress's appropriation of almost \$300 million to IMLS"; that it inflicted irreparable injury by "forc[ing] libraries to end programs midstream, fire employees, and in some cases, completely shutter"; and that the balance of the equities and public interest favored entry of a TRO. Ex. 1 at 3-5. Although plaintiffs had initially requested a preliminary injunction, at oral argument they converted that motion to a request for a TRO in light of "imminent firings" expected on May 4. *Id.* at 1. The court granted a limited TRO preserving "the status quo as of the date" of its order to "prevent additional harm while allowing the Court to further consider the parties' briefing on the PI." *Id.* at 1-2.

The *Sonderling* opinion reinforces the conclusion that all of the preliminary injunction factors favor plaintiffs in this case. Although the *Sonderling* court issued a limited TRO, the court made clear that it did so merely as an interim measure to preserve the status quo while it considered the PI motion, given the likelihood of imminent firings anticipated on May 4 and the fact that it had held oral argument only one day earlier. *Id.* at 1-2. Nothing in that ruling suggests that the court believed the preliminary injunction—which remains under consideration—should be so

limited. And for the reasons set forth in the Plaintiffs States' motion and reply, broad preliminary injunctive relief is necessary here to provide complete relief to the plaintiffs, who are suffering serious ongoing harm from the steps Defendants have already taken to implement the Closure Order and the Closure Decisions at IMLS, the Minority Business Development Agency, and the Federal Mediation and Conciliation Service.

Separately, as Defendants have noted (ECF No. 55), on May 1 the D.C. Circuit administratively stayed the district court's preliminary injunction in *Widakuswara v. Lake*, No. 1:25-cv-1015-RCL (D.D.C. Apr. 22, 2025), solely to the extent that it required immediate disbursement of grant funds. The D.C. Circuit's decision states that “[t]he purpose of this administrative stay is to give the court sufficient opportunity to consider the emergency motions for stay pending appeal *and should not be construed in any way as a ruling on the merits of those motions.*” *Widakuswara v. Lake*, No. 25-5144 (D.C. Cir. May 1, 2024) (emphasis added). By its terms, this decision makes clear that it reflects no view on the merits of the government's motion for stay pending appeal. Further, and notably, the court declined the federal government's request to grant a broad administrative stay of the district court's order, and only paused the disbursement of funds that the federal government represented were due to be paid out imminently. Emergency Mot. For Administrative Stay and Partial Stay Pending Appeal at 2, 24, *Widakuswara v. Lake*, Nos. 25-5144, 25-514 (D.C. Cir. Apr. 25, 2025).

[signatures on following page]

Respectfully submitted,

**PETER F. NERONHA**

Attorney General for the State of Rhode Island

/s/ Natalya A. Buckler

Kathryn M. Sabatini (RI Bar No. 8486)  
Chief, Civil Division  
Special Assistant Attorney General  
Katherine Connolly Sadeck (RI Bar No. 8637)  
Solicitor General  
Assistant Attorney General  
Keith D. Hoffmann (RI Bar No. 9872)  
Chief of Policy  
Assistant Attorney General  
Natalya A. Buckler (RI Bar No. 8415)  
Assistant Attorney General  
Paul Meosky (RI Bar No. 10742)  
Special Assistant Attorney General  
150 South Main Street  
Providence, RI 02903  
Phone: (401) 274-4400  
Fax: (401) 222-2995  
[ksabatini@riag.ri.gov](mailto:ksabatini@riag.ri.gov)  
[ksadeck@riag.ri.gov](mailto:ksadeck@riag.ri.gov)  
[khoffmann@riag.ri.gov](mailto:khoffmann@riag.ri.gov)  
[nbuckler@riag.ri.gov](mailto:nbuckler@riag.ri.gov)  
[pmeosky@riag.ri.gov](mailto:pmeosky@riag.ri.gov)

*Attorneys for the State of Rhode Island*

**LETITIA JAMES**

Attorney General for the State of New York

By: /s/ Abigail Katowitz-Liu

Abigail Katowitz-Liu  
Assistant Attorney General  
Rabia Muqaddam  
Special Counsel for Federal Initiatives  
Sean Bunny  
Assistant Attorney General  
28 Liberty St.  
New York, NY 10005  
(212) 416-8922  
[Abigail.katowitz-liu@ag.ny.gov](mailto:Abigail.katowitz-liu@ag.ny.gov)  
[Rabia.muqaddam@ag.ny.gov](mailto:Rabia.muqaddam@ag.ny.gov)  
[Sean.bunny@ag.ny.gov](mailto:Sean.bunny@ag.ny.gov)

*Attorneys for the State of New York*

**ANNE E. LOPEZ**

Attorney General for the State of Hawai‘i

By: /s/ Kaliko ‘onālani D. Fernandes

David D. Day  
Special Assistant to the Attorney General  
Kaliko‘onālani D. Fernandes  
Solicitor General  
425 Queen Street  
Honolulu, HI 96813  
(808) 586-1360  
[kaliko.d.fernandes@hawaii.gov](mailto:kaliko.d.fernandes@hawaii.gov)

**KRISTIN K. MAYES**

Attorney General  
State of Arizona

/s/ Syreeta A. Tyrell

Syreeta A. Tyrell  
Assistant Attorney General  
2005 North Central Avenue  
Phoenix, Arizona 85004  
Phone: (602) 542-8310  
[Syreeta.Tyrell@azag.gov](mailto:Syreeta.Tyrell@azag.gov)  
[ACL@azag.gov](mailto:ACL@azag.gov)

*Attorneys for the State of Arizona*

**ROB BONTA**

ATTORNEY GENERAL OF CALIFORNIA

/s/ Jay C. Russell

Jay C. Russell  
Deputy Attorney General  
Thomas S. Patterson  
Senior Assistant Attorney General  
Anya M. Binsacca  
Supervising Deputy Attorney General  
Zelda Vassar  
Deputy Attorney General  
California Attorney General’s Office  
455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102  
(415) 510-3617  
[Jay.Russell@doj.ca.gov](mailto:Jay.Russell@doj.ca.gov)  
[Zelda.Vassar@doj.ca.gov](mailto:Zelda.Vassar@doj.ca.gov)

*Counsel for the State of California*

**PHILIP J. WEISER**  
Attorney General of Colorado

By: /s/ David Moskowitz  
David Moskowitz  
*Deputy Solicitor General*  
1300 Broadway, #10  
Denver, CO 80203  
(720) 508-6000new  
[David.Moskowitz@coag.gov](mailto:David.Moskowitz@coag.gov)

**WILLIAM TONG**  
Attorney General  
State of Connecticut

/s/ Ashley Meskill  
Ashley Meskill  
Assistant Attorney General  
165 Capitol Avenue  
Hartford, CT 06106  
Phone: (860) 808 5270  
[Ashley.Meskill@ct.gov](mailto:Ashley.Meskill@ct.gov)

**KATHLEEN JENNINGS**  
Attorney General of the State of Delaware

By: /s/ Vanessa L. Kassab  
IAN R. LISTON  
Director of Impact Litigation  
VANESSA L. KASSAB  
Deputy Attorney General  
Delaware Department of Justice  
820 N. French Street  
Wilmington, DE 19801  
(302) 683-8899  
[vanessa.kassab@delaware.gov](mailto:vanessa.kassab@delaware.gov)

**KWAME RAOUL**  
Attorney General of Illinois

/s/ Holly F.B. Berlin  
HOLLY F.B. BERLIN  
Assistant Attorney General  
Office of the Illinois Attorney General  
115 S. LaSalle St.  
Chicago, IL 60603  
(312) 814-3000  
[holly.berlin@ilag.gov](mailto:holly.berlin@ilag.gov)  
Counsel for the State of Illinois

**AARON M. FREY**  
Attorney General for  
the State of Maine

/s/ Vivian A. Mikhail  
Vivian A. Mikhail  
Deputy Attorney General  
Office of the Attorney General  
6 State House Station  
Augusta, ME 04333-0006  
Tel.: 207-626-8800  
Fax: 207-287-3145  
[Vivian.Mikhail@maine.gov](mailto:Vivian.Mikhail@maine.gov)

**ANTHONY G. BROWN**  
Attorney General for the State of Maryland

By: /s/ Keith M. Jamieson  
Keith M. Jamieson  
Assistant Attorney General  
200 Saint Paul Place, 20th Floor  
Baltimore, Maryland 21202  
(410) 576-6960  
[kjamieson@oag.state.md.us](mailto:kjamieson@oag.state.md.us)  
*Attorneys for the State of Maryland*

**ANDREA JOY CAMPBELL**  
Attorney General of Massachusetts

/s/ Katherine Dirks  
Katherine Dirks  
*Chief State Trial Counsel*  
Office of the Attorney General  
One Ashburton Place, 20th Floor  
Boston, MA 02108  
(617) 963-2277  
[katherine.dirks@mass.gov](mailto:katherine.dirks@mass.gov)  
*Attorney for the State of Massachusetts*

**DANA NESSEL**  
Attorney General for the People of Michigan

/s/ Neil Giovanatti  
Neil Giovanatti  
BreAnna Listermann  
*Assistant Attorneys General*  
Michigan Department of Attorney General  
525 W. Ottawa  
Lansing, MI 48909  
(517) 335-7603  
[GiovanattiN@michigan.gov](mailto:GiovanattiN@michigan.gov)  
[ListermannB@michigan.gov](mailto:ListermannB@michigan.gov)

**KEITH ELLISON**  
Attorney General for the State of Minnesota

By: /s/ Jacob Harris  
Jacob Harris  
Assistant Attorney General  
445 Minnesota Street, Suite 600  
St. Paul, Minnesota, 55101  
(651) 757-1156  
Jacob.Harris@ag.state.mn.us

**AARON D. FORD**  
Attorney General of Nevada

By: /s/ Heidi Parry Stern  
Heidi Parry Stern (Bar. No. 8873)  
Solicitor General  
Office of the Nevada Attorney General  
1 State of Nevada Way, Ste. 100  
Las Vegas, NV 89119  
HStern@ag.nv.gov

**MATTHEW J. PLATKIN**  
Attorney General of New Jersey

/s/ Joshua Bohn  
Joshua Bohn  
Max Lesser\*  
*Deputy Attorneys General*  
Office of the Attorney General  
25 Market Street  
Trenton, NJ 08625  
(609) 696-5366  
[Joshua.Bohn@law.njoag.gov](mailto:Joshua.Bohn@law.njoag.gov)  
[Max.Lesser@law.njoag.gov](mailto:Max.Lesser@law.njoag.gov)  
*Counsel for the State of New Jersey*

**RAÚL TORREZ**  
Attorney General of New Mexico

/s/ Anjana Samant  
Anjana Samant  
Deputy Counsel for Impact Litigation  
New Mexico Department of Justice  
P.O. Drawer 1508  
Santa Fe, NM 87504-1508  
(505) 490-4060  
[asamant@nmdoj.gov](mailto:asamant@nmdoj.gov)  
Attorney for Plaintiff State of New Mexico

**DAN RAYFIELD**  
Attorney General for the State of Oregon

/s/ Brian Simmonds Marshall  
Brian Simmonds Marshall  
*Senior Assistant Attorney General*  
100 SW Market Street  
Portland, OR 97201  
(971) 673-1880  
[brian.s.marshall@doj.oregon.gov](mailto:brian.s.marshall@doj.oregon.gov)  
*Attorneys for the State of Oregon*

**CHARITY R. CLARK**  
Attorney General for the State of Vermont

By: /s/ Ryan P. Kane  
Ryan P. Kane  
Deputy Solicitor General  
109 State Street  
Montpelier, VT 05609  
(802) 828-2153  
[Ryan.kane@vermont.gov](mailto:Ryan.kane@vermont.gov)

**NICHOLAS W. BROWN**  
Attorney General for the State of Washington

/s/ Kate S. Worthington  
KATE S. WORTHINGTON, WSBA #47556  
SARAH E. SMITH-LEVY, WSBA #55770  
Assistant Attorneys General  
7141 Cleanwater Drive SW  
P.O. Box 40111  
Olympia, WA 98504-0111  
(306) 709-6470  
[kate.worthington@atg.wa.gov](mailto:kate.worthington@atg.wa.gov)  
[sarah.e.smith-levy@atg.wa.gov](mailto:sarah.e.smith-levy@atg.wa.gov)  
Attorneys for Plaintiff State of Washington

**JOSHUA L. KAUL**

Attorney General for the State of Wisconsin

/s/ Colin T. Roth

COLIN T. ROTH

Assistant Attorney General

WI State Bar #1103985

Wisconsin Department of Justice

Post Office Box 7857

Madison, Wisconsin 53707-7857

(608) 266-7636

[rothct1@doj.state.wi.us](mailto:rothct1@doj.state.wi.us)

Attorney for Plaintiff State of Wisconsin

\*Applications for pro hac vice forthcoming

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I filed the within via the ECF filing system and that a copy is available for viewing and downloading. I have also caused a copy to be sent via the ECF System to counsel of record on this 2nd day of May 2025.

/s/ Paul T.J. Meosky